

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
BIG STONE GAP DIVISION

United States of America

v.

Docket No. 2:20-CR-17-MFU

Samuel Silva

Defense Proposed Additions to Jury Questionnaire

Samuel Silva, through counsel, respectfully submits the following questions, labeled A – O, as proposed additional questions to add to the questions proposed by the government. Mr. Silva does not object to the government’s questions, and only proposes two additions—that Mr. Randy Verlin Cargil’s name be added to counsel for the defense, and that an option be permitted for people to select non-binary or gender nonconforming. If the government has already identified a case agent who will sit at counsel table, the defense requests that the case agent’s name be added as well.

Respectfully submitted,

/s/ Benjamin Schiffelbein

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A. Do you believe that being a member of a gang in prison makes someone inherently more violent than another inmate who may not be a member of a gang?

☐ Yes ☐ No

If yes, please explain.

B. Do you believe that inmates who are not members of a gang are more trustworthy than inmates who are members of gangs?

☐ Yes ☐ No

If yes, please explain.

C. Do you believe that being a member of a gang should be a criminal offense?

☐ Yes ☐ No

If yes, please explain.

D. Do you believe it would be impossible to act in self-defense and stab another more than one hundred times?

☐ Yes ☐ No

E. Do you believe that people serving long prison sentences have little reason to obey the law?

☐ Yes ☐ No

If yes, please explain.

F. Do you believe that people of Mexican heritage are more likely to be members of gangs?

☐ Yes ☐ No

If yes, please explain.

G. Do you believe that gangs in New Mexico are more violent than gangs in other states?

☐ Yes ☐ No

If yes, please explain.

H. Do you believe that people who speak Spanish are more likely to be violent than people who do not speak Spanish?

☐ Yes ☐ No

If yes, please explain.

I. Do you agree with the following statement: if two people can speak English and Spanish but choose to communicate in Spanish, they are likely to be hiding something.

☐ Yes ☐ No

If yes, please explain.

J. Do you believe that people in America should speak English?

☐ Yes ☐ No

If yes, please explain.

K. Do you believe that inmates alone are responsible for prison violence?

☐ Yes ☐ No

If yes, please explain.

L. Do you believe that inmates should not get any say in the person with whom they are made to share a cell?

☐ Yes ☐ No

If yes, please explain.

M. Do you believe that people who are in prison forfeit their right to self-defense, at least while they are imprisoned?

☐ Yes ☐ No

If yes, please explain.

N. Do you believe that it is never reasonable for one inmate in prison to act violently toward another inmate?

☐ Yes ☐ No

If yes, please explain.

O. Do you believe that it is never reasonable for an inmate in prison to use a weapon in self-defense against another inmate? Put another way, because weapons are illegal in prison, do you believe that possessing a weapon means a person cannot act in self-defense?

☐ Yes ☐ No

If yes, please explain.
